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April 17, 2020

Hon. Laura Taylor Swain
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Constantinescu, et al.*
Docket No.: 19-CR-651

Dear Judge Swain:

I am CJA counsel to Defendant Florian Claudiu Martin in the above referenced case. I was appointed to represent Mr. Martin on October 11, 2019. I write to respectfully ask the Court to appoint Chase Ruddy, Esq., as associate CJA counsel to Mr. Martin *nunc pro tunc* to October 11, 2019.

This is a 28-defendant case with extensive discovery. According to Discovery Coordinator Emma Greenwood, the surveillance video alone exceeds 40 Terabytes. The discovery pertinent to Mr. Martin, and accordant legal issues, are extensive. Evidence seized at the time of Mr. Martin's arrest, for example, includes at least 25 electronic devices. Those devices, along with other evidence were seized abroad, by Mexican authorities, and sent to the United States, potentially raising additional complicated and novel legal issues.

Mr. Martin remains detained at the MCC New York, and the task of communicating with him and reviewing with him the extensive discovery in this case is and will continue to be a significant undertaking, especially as we continue to adapt to the changing conditions presented by COVID-19.

Mr. Ruddy has already done a significant amount of work behind-the-scenes to assist me with Mr. Martin's case. Mr. Ruddy is an experienced attorney who has worked for my firm since September 2011. He has been admitted to practice in the Southern and Eastern Districts of New York, and the District of New Jersey, for more than seven years and has worked on well over 100 federal criminal cases with me, including numerous CJA matters. He has previously been appointed as associate CJA counsel in this district, including in a recent case before Judge Preska (*United States v. Nikoloz Jikia*, 17-CR-350). He has extensive experience litigating federal criminal cases and his work on this case has already greatly aided Mr. Martin (and me), and will continue to do so, while representing a cost saving measure to the Court.

Due to an oversight on my part, this request was not made at the time I was appointed. I ask that the Court grant it now *nunc pro tunc* so that the work already performed by Mr. Ruddy may be recognized. If the Court is inclined to grant this request, I respectfully request that Mr. Ruddy be appointed at the associate rate of \$110 per hour at which the Court has approved other associates in this case.

I thank Your Honor for your consideration and wish everyone well.

Respectfully submitted,

/s/ *Edward V. Sapone*
Edward V. Sapone